

Risk Assessment Method for Local Air Pollution Control

Score Sheet

| Name of authorised process/installation | BAE Systems Maritime - Submarines |
|------------------------------------------|-----------------------------------|
| Name of person with whom sheet discussed | Damon Pearson |
| Process Guidance Note | PG 6/23 & 32 |
| Local Authority Reference | PPC/B/05 |
| Inspector's Name | Geoff Dowker |
| Date | 05 th March 2015 |

Environmental Impact Appraisal

| Component 1 – Inherent Environmental Impact Potential | | | | |
|---------------------------------------------------------|----|----|--|--|
| APRR Risk Rating Category Possible Scores Score Awarded | | | | |
| (A) Category 1 | 10 | | | |
| (B) Category 2 | 20 | 20 | | |
| (C) Category 3 | 30 | | | |

| Component 2 - Progress with Upgrading | | | | | |
|-----------------------------------------------------|-----|---|--|--|--|
| Status of Upgrading Possible Scores Score Awarded | | | | | |
| (A) Upgrading not complete but PG Note deadline has | 5 | | | | |
| yet to be reached | | | | | |
| (B) Upgrading not yet complete and PG Note deadline | 10 | | | | |
| has passed | | | | | |
| (C) Upgrading complete and meets BATNEEC | 0 | 0 | | | |
| Requirements | | | | | |
| (D) Emissions control exceeds BATNEEC Requirements | -10 | | | | |

| Component 3 - Sensitivity and Proximity of Receptors (circle appropriate score) | | | | | | |
|---------------------------------------------------------------------------------|---------------|---------------|--------------|--|--|--|
| Sensitivity of Receptors | | | | | | |
| Proximity to Emission Source (x) High (y) Med (z) Low | | | | | | |
| (A) < 100m* | 20 | 12 | 5 | | | |
| (B) 100 - 250m* | 12 | 10 | 3 | | | |
| (C) 250 - 500m* | 5 | 3 | 1 | | | |
| (D) >500m* | | | | | | |

^{*} All distances should be multiplied by a factor of 2 for mineral and cement & lime processes and by a factor of 4 for combustion, incineration (not cremation), iron & steel and non-ferrous metal processes.

Note: Distances should be measured from the process itself, rather than the site boundary.

| Component 4 – Other Targets | | | | |
|-------------------------------------------------------|-----------------|---------------|--|--|
| | Possible Scores | Score Awarded | | |
| (A) Other air pollution problems in the local area to | 10 | | | |
| which process is a potential contributor | | | | |
| (B) No such air pollution problems | 0 | 0 | | |

| Total for Environmental Impact Apprais | Range 0 to 70 | 40 |
|----------------------------------------|---------------|----|
| | 9-1-1 | _ |

Operator Performance Appraisal

| Component 5 - Compliance Assessment | | | | |
|------------------------------------------------------------------------------------------|-----------------|---------------|--|--|
| Scale of Non-Compliance | Possible Scores | Score Awarded | | |
| (A) Incident leading to justified complaint but no | 0 | 0 | | |
| breach of any specific authorisation condition or of | | | | |
| the general/residual BATNEEC condition | | | | |
| (B) Incident leading to a justified complaint* | 5 per incident | 0 | | |
| (C) Breach of authorisation not leading to formal | 10 per incident | 0 | | |
| action | | | | |
| (D) Incident leading to formal caution, Enforcement | 15 per incident | 0 | | |
| Notice or prosecution | | | | |
| (E) Incident leading to a Prohibition Notice or | 20 per incident | 0 | | |
| Suspension Notice | | | | |
| Total | (Max 50) | 0 | | |
| * Unjustified complaints may be a gethere considered by the inspector to be unreasonable | | | | |

^{*} Unjustified complaints may be e.g. those considered by the inspector to be unreasonable or which cannot be clearly linked to an incident at the process.

| Scoring for Component 6 - Assessment of Monitoring, Maintenance and Records | | | | |
|-----------------------------------------------------------------------------|-----------------|--------|-----|---------|
| | Possible Scores | | | |
| Criterion | (x) | (y) No | (z) | Score |
| | Yes | | N/A | Awarded |
| (A) All monitoring undertaken to the degree | 0 | 10 | 0 | 0 |
| required in the authorisation? | | | | |
| (B) Monitoring requirements reduced because | -5 | 0 | 0 | 0 |
| results over time show consistent compliance? | | | | |

| (C) Process operation modified where any | 0 | 5 | 0 | 0 |
|---------------------------------------------|---|------------|---|---|
| problems indicated by monitoring? | | | | |
| (D) Fully documented and adhered to | 0 | 5 | 0 | 0 |
| maintenance programme, in line with | | | | |
| authorisation? | | | | |
| (E) Full documented records as required in | 0 | 5 | 0 | 0 |
| authorisation available on-site? | | | | |
| (F) All relevant documents forwarded to the | 0 | 5 | 0 | 0 |
| authority by date required? | | | | |
| Total Score | | (-5 to 30) | | 0 |

| Component 7 - Assessment of Management, Training and Responsibility | | | | |
|---------------------------------------------------------------------|-----|------------|-----|---------|
| | Pos | ssible Sco | | |
| Criterion | (x) | (y) No | (z) | Score |
| | Yes | | N/A | Awarded |
| (A) Documented procedures in place for | 0 | 5 | 0 | 0 |
| implementing all aspects of the authorisation? | | | | |
| (B) Specific responsibilities assigned to | 0 | 5 | 0 | 0 |
| individual staff for these procedures? | | | | |
| (C) Completion of individual responsibilities | 0 | 5 | 0 | 0 |
| checked and recorded by the company? | | | | |
| (D) Documented training records for all staff | 0 | 5 | 0 | 0 |
| with air pollution control responsibilities? | | | | |
| (E) Trained staff on site throughout periods | 0 | 5 | 0 | 0 |
| where potentially air-polluting activities take | | | | |
| place? | | | | |
| (F) Is an 'appropriate' environmental | -5 | 0 | 0 | -5 |
| management system in place? | | | | |
| Total Score (-5 to 25) | | -5 | | |

| Total for | Operator Performance Appraisal | Range -10 to | -5 |
|-----------|--------------------------------|--------------|----|
| | | 105 | |

| Overall Score for the Process | Range -10 to 175 | 35 |
|----------------------------------------------------------------|------------------|-----|
| Regulatory Effort Category High =>80, med = 40 – 80, low = <40 | Low/Med/High | Low |